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December 30, 2024

VIA ECF

Honorable Lee H. Rosenthal
United States District Judge
Southern District of Texas
United States District Courts
515 Rusk St.
Houston, Texas 77002

Re: *Broadnax v. Elliott, et al.*, No. 4:24-cv-03132

Dear Judge Rosenthal:

We represent Plaintiff James Broadnax in the instant action. We write to advise the Court that Plaintiff's counsel has conferred with counsel for Defendants Lizette Fernandez, Samantha Horn, Joni Schaeffer, Jamar Bey, Paul Reilley, and Suzanne Fults, and such Defendants' counsel have agreed to Plaintiff's suggested extension and consolidation of the Motions to Dismiss from such Defendants.

Plaintiff will file a consolidated brief in opposition to the Motions to Dismiss of Defendants Samantha Horn, Joni Schaeffer, Jamar Bey, and Suzanne Fults, (ECF 46), and that of Defendants Lizette Fernandez and Paul Reilley, (ECF 48), no later than January 17, 2025. As such, the current pending Unopposed Motion for Extension of Time to File Brief in Opposition to Defendants Lizette Fernandez, Samantha Horn, Joni Schaeffer, Jamar Bey, Paul Reilley, Suzanne Fults' Motion to Dismiss filed on December 11, 2024, (ECF 47), is moot.

As noted in the parties' Stipulation and Proposed Order re: Consolidated Opposition to Defendants Owen Murray, Bryan Collier, Bobby Lumpkin, and Lannette Linthicum's Motions to Dismiss which was filed on December 20, 2024, (ECF 57), and remains pending, as agreed by Defendants' counsel, with the Court's respectfully requested permission Plaintiff will file a separate consolidated opposition to those Motions to Dismiss, (ECF 48, 56), no later than January 21, 2025.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

Honorable Lee H. Rosenthal

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Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &
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